Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to a Mobile Satellite Service in the 1610-1626.5 / 2483.5-2500 MHz Frequency Bands	)	CC Docket 92-166

REPLY COMMENTS OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION

The National Emergency Number Association ("NENA") hereby replies to certain comments on the Notice of Proposed Rulemaking ("NPRM") issued by the Federal Communications Commission ("Commission") in the above-captioned proceeding.

Interest of NENA

Established in 1982 as a not-for-profit corporation, NENA's mission is to foster the technological advancement, availability and implementation of a universal emergency telephone number system. It conducts and promotes research, planning, education and training toward the goals of protecting lives and property and maintaining general community security. NENA has more than 3500 individual members and chapters in 29 states.

In comments in prior dockets, NENA has urged that mobile service providers, such as cellular and PCS, provide for enhanced 9-1-1 ("E-911") service with the same features and functionality as provided by wire-line telephone service providers. NENA believes that the best means of attaining this

goal is to address the provision of E-911 service by mobile services while such services are still in the early stages of design and development. In the case of Mobile Satellite Service ("MSS"), NENA urges the Commission to (1) use this proceeding to formally require E-911 capability or (2) include MSS in the Commission's promised proceeding on wireless E-911 for all forms of mobile communications.[1]

Background

In the late 1960s, upon the recommendation of the President's Commission on Law Enforcement that a nationally uniform emergency number be established, AT&T reserved the digits 9-1-1. In 1973, the White House Office of Telecommunications Policy declared the benefits of the single number and encouraged its adoption. With the proliferation of telecommunications equipment and services accelerated by AT&T's divestiture 10 years later, Enhanced 9-1-1 services began to appear and are now available to more than three-quarters of the nation's wire telephone access lines.[2]

Enhanced 9-1-1 service combines the benefit of a nationwide single emergency number with the additional benefits of allowing the Public Safety Answering Point ("PSAP") to immediately identify the telephone number and location of the calling party and the nearest emergency response team. These additional benefits are available on wireline but not on wireless calls. It has taken nearly twenty-five years for E-911 service to become available to most communities nationwide. However, just as this service has become widely

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[1] See Amendment of the Commission's Rules to Establish New Personal Communications Services, Second Report and Order, 8 F.C.C. Rcd. 7700, ¶ 139 (1993).

[2] Sue Pivetta, *The 9-1-1 Puzzle* (Coshocton, Ohio: National Emergency Number Association, 1993), 6-7.

available over the wireline network, the American public has begun to make extensive use of mobile communication technologies. This has jeopardized the availability of E-911 service to a constantly growing segment of the population.

The Commission should take steps now, early in the deployment of many of these newly emerging mobile technologies, to ensure that E-911 service capability is built into mobile service offerings. The early involvement of the Commission and other federal and state agencies will help to ensure that the deployment of E-911 service in mobile communications services will not take 25 years, as was the case with wireline service.

MSS must be able to interface effectively with E-911.

The Commission does not expressly address the provision of E-911 service in the NPRM. However, the agency does address distress and safety communications, and recognizes the potential of MSS to complement existing search and rescue and disaster response services. NPRM at ¶ 86.[3] At least three commenters, the United States Coast Guard, the National Association of EMS Physicians, and Bernard Trudell, have urged the Commission to take this proceeding one step further by requiring MSS to provide features necessary to interface effectively with E-911 systems. NENA adds its voice in support of these commenters.

As part of its proposed rules, the Commission intends to require that MSS above 1 GHz have position determination capability. This capability would allow a PSAP to identify an emergency caller's location, similar to E-911 automatic location identification available over wireline networks. Since the Commission

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[3] The Commission also requests comments generally on "whether any other service requirements should be imposed in the context of this proceeding." NPRM at ¶ 87.

already intends to impose radiodetermination upon MSS, it should take the further step of requiring compatibility with E-911 service.

The Coast Guard emphasizes the importance of caller identification and location to its own safety operations. According to the Coast Guard, it

> will depend increasingly on 911 and Caller ID facilities to aid in prosecuting search & rescue cases, as well as in preventing hoaxes. There is a public expectation that any mobile or mobile satellite system that can be used like a telephone have the same emergency capability as a telephone. For example, this system must be capable of providing a public safety agency with the ability of identifying and locating an emergency caller, and returning calls to the mobile unit that initiated an emergency call.

These are services that are currently provided through wireline E-911 and, as the Coast Guard recognizes, may be expected by the public using MSS. The Coast Guard has also commented similarly in Amendment of the Commission's Rules to Establish New Personal Communications Services, GEN Docket 90-314, and requests that the requirements adopted in that proceeding apply to MSS.

The National Association of EMS Physicians ("EMS Physicians") also urges the Commission to include E-911 compatibility as a requirement of MSS. EMS Physicians particularly notes the failure of cellular systems to interface effectively with E-911 despite their deep penetration into the communications market.[4] This experience with cellular should lead the Commission to conclude that it must impose an interface requirement upon MSS, and other mobile services, as they are under development.

Bernard Trudell, in his comments, also uses the example of cellular systems to illustrate the failure of the general market to bring about E-911

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[4] Relatively inexpensive solutions to cellular-based radiolocation have been proposed by, among others, KSI, Inc. (See Comments of KSI, Inc. in response to Petitions for Reconsideration in GEN Docket 90-314) and by makers of satellite GPS chips (See Ralph Vartabedian, Eye in the Sky, L.A. Times, May 1, 1994, at D1.

interface capability. In addition, Mr. Trudell points out the ability of MSS to fill in the gaps in E-911 service in the wireline network. Trudell at 3.

Conclusion

NENA supports those commenters who urge the Commission to require that MSS interface effectively with enhanced 9-1-1 service. The Commission should impose such a requirement in this proceeding. In the alternative, MSS should be included in the Commission's promised proceeding on wireless E-911 for all forms of mobile communications.

Respectfully submitted,

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June 20, 1994

CERTIFICATE OF SERVICE

I, Michelle D. O'Brien, do hereby certify that a copy of the attached REPLY COMMENTS OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION, which was filed with the Federal Communications Commission on June 20, 1994, has been served today via postage paid, regular mail to the recipients on the following pages.

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